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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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IN THE MATTER OF THE APPLICATION OF
ARIZONA WATER COMPANY, AN ARIZONA
CORPORATION, TO EXTEND ITS EXISTING
CERTIFICATE OF CONVENIENCE AND
NECESSITY IN THE CITY OF CASA GRANDE
AND IN PINAL COUNTY, ARIZONA.

Docket No. W-01445A-06-0199

IN THE MATTER OF THE APPLICATION OF
PALO VERDE UTILITIES COMPANY FOR AN
EXTENSION OF ITS EXISTING CERTIFICATE
OF CONVENIENCE AND NECESSITY.

Docket No. SW-03575A-05-0926

IN THE MATTER OF THE APPLICATION OF
SANTA CRUZ WATER COMPANY FOR AN
EXTENSION OF ITS EXISTING CERTIFICATE
OF CONVENIENCE AND NECESSITY.

Docket No. W-03576A-05-0926

IN THE MATTER OF THE APPLICATION OF
PALO VERDE UTILITIES COMPANY FOR AN
EXTENSION OF ITS EXISTING CERTIFICATE
OF CONVENIENCE AND NECESSITY.

Docket No. SW-03575A-07-0300

IN THE MATTER OF THE APPLICATION OF
SANTA CRUZ WATER COMPANY FOR AN
EXTENSION OF ITS EXISTING CERTIFICATE
OF CONVENIENCE AND NECESSITY.

Docket No. W-03576A-07-0300

ARIZONA WATER COMPANY, AN ARIZONA
CORPORATION,

COMPLAINANT,

VS.

GLOBAL WATER RESOURCES, LLC, A
FOREIGN LIMITED LIABILITY COMPANY;
GLOBAL WATER RESOURCES, INC., A
DELAWARE CORPORATION; GLOBAL

Docket No. W-01445A-06-0200
Docket No. SW-20445A-06-0200
Docket No. W-20446A-06-0200
Docket No. W-03576A-06-0200
Docket No. SW-03575A-06-0200

Global Utilities'
Post-Hearing Brief

WATER MANAGEMENT, LLC, A FOREIGN
LIMITED LIABILITY COMPANY; SANTA
CRUZ WATER COMPANY, LLC, AN
ARIZONA LIMITED LIABILITY
CORPORATION; PALO VERDE UTILITIES
COMPANY, LLC, AN ARIZONA LIMITED
LIABILITY CORPORATION; GLOBAL WATER
– PALO VERDE UTILITIES COMPANY, AN
ARIZONA CORPORATION; JOHN AND JANE
DOES I-20; ABC ENTITIES I-XX,

RESPONDENTS.

IN THE MATTER OF THE JOINT
APPLICATION OF CP WATER COMPANY
AND FRANCISCO GRANDE UTILITIES
COMPANY TO TRANSFER THEIR
CERTIFICATES OF CONVENIENCE AND
NECESSITY AND ASSETS TO PALO VERDE
UTILITIES COMPANY AND SANTA CRUZ
WATER COMPANY.

Docket No. WS-01775A-07-0485
Docket No. SW-03575A-07-0485
Docket No. W-02442A-07-0485
Docket No. W-03576A-07-0485

**Global Utilities’
Post-Hearing Brief**

Global Water – Palo Verde Utilities (“Palo Verde”), Global Water – Santa Cruz Water
Company (“Santa Cruz”), Francisco Grande Utilities Company (“Francisco Grande”) and CP
Water Company (“CP Water”) (collectively, the “Global Utilities”) respectfully submit this post-
hearing brief and request that the Commission approve the Settlement Agreement between the
Global Utilities and Arizona Water Company (“Arizona Water”), approve the certificate
extensions requested by the parties, and approve the transfers of CP Water and Francisco Grande
as requested in the consolidated dockets.

I. Introduction.

The Global Utilities and Arizona Water were locked in an intense, costly battle for territory
in Pinal County. They resolved their differences and reached a Settlement Agreement. The
Settlement Agreement is in the public interest because:

1. It provides for the sale of recycled water by Arizona Water – an important step
forward for Arizona.

2. It creates sensible planning areas, allowing the utilities to plan for their future and preventing needless conflict.

3. It supports reasonable certificate extension requests within those planning areas. The proposed extensions for the Global Utilities are fully consistent with the Commission's recent certificate orders.

4. It supports the resolution of a number of minor, uncontested Global dockets. The Settlement Agreement resolves a significant dispute, conserves resources, and will prevent future disputes. The Settlement Agreement is supported by the Cities of Maricopa and Casa Grande and by local developers. The Commission should approve the Settlement Agreement in full, including approval of the planning areas, certificate extensions, and certificate transfers.

II. Benefits of the Settlement Agreement.

The Settlement Agreement has numerous benefits, including:

A. Promotion of Recycled Water.

The Global Utilities believe that recycled water¹ is a critical component of Arizona's water future. It is simply wasteful to use groundwater to irrigate golf courses and other turf features. A key feature of the Settlement Agreement is that the Global Utilities will provide recycled water to Arizona Water, who will then resell it within a portion of their service area (where Global Water – Palo Verde provides wastewater service).

Arizona Water, as a water-only provider, has generally not provided recycled water. As Staff witness Ms. Jaress agreed "historically Arizona Water has not been a big promoter or user of recycled water."² Chairman Mayes and other commissioners have encouraged Arizona Water to obtain recycled water from wastewater providers and provide it to their customers. For this reason, Ms. Jaress agreed that this provision was a "step forward."³

¹ Recycled water is an appropriate term used by ADEQ. See Tr. at 286:17-20.

² Tr. at 42:22-25.

³ Tr. at 43:1-7.

1 However, Ms. Jaress expressed concern that resale of recycled water by Arizona Water
2 would result in higher cost to customers.⁴ This concern is unfounded. Ms. Jaress conceded that
3 her concerns were not based on a review of any cost studies.⁵ And Arizona Water's President, Mr.
4 Garfield, testified that Arizona Water would submit a recycled water tariff that would merely
5 match the price paid for the recycled water.⁶ Ms. Jaress testified that she was not aware of these
6 efforts by Arizona Water.⁷ Thus, Staff's concern about cost has been addressed. And Ms. Jaress
7 testified that other than the cost issue "certainly it would be a good thing for Arizona Water to sell
8 recycled water to its customers."⁸

9 Ms. Jaress's Staff Report also expressed a concern that the territory covered by this
10 provision was too large. But both Arizona Water and Global testified that this provision is limited
11 to the areas where Arizona Water's water certificate and Palo Verde's wastewater certificate
12 overlap.⁹

13 Ms. Jaress also testified that the resale of recycled water by Arizona Water would be
14 beneficial based on what is known now.¹⁰ However, Ms. Jaress argued that "[w]e don't know
15 what the future would bring."¹¹ But the Commission must base its decision on the facts before it,
16 not on vague and unsubstantiated concerns about the future. The facts in the record show that the
17 resale of recycled water by Arizona Water under the Settlement Agreement is in the public
18 interest.

19 **B. Resolution of current disputes; preservation of resources.**

20 Another benefit of the Settlement Agreement is that it will resolve the current dispute
21 between Arizona Water and the Global Utilities. Prior to the settlement, Arizona Water and the
22

23 ⁴ Id.

24 ⁵ Tr. at 43:18-21.

25 ⁶ Tr. at 68-69.

26 ⁷ Tr. at 54:1-7.

27 ⁸ Tr. at 64:24-25.

⁹ Ex. G-2 (Symmonds Rebuttal) at 5:18-19; AWC Ex. A-2 (Garfield Rebuttal) at 17.

¹⁰ Tr. at 64.

¹¹ Tr. at 64:12-13.

1 Global Utilities were vigorously litigating these dockets. In the absence of a settlement, the
2 parties, Staff, and the Commission would likely have to devote "massive resources" to the
3 resolution of these complex dockets.¹²

4 **C. Prevention of future disputes.**

5 Arizona Water and the Global Utilities are the main water utilities in the Maricopa / Casa
6 Grande region. There are substantial areas between their existing certificate areas. This "naturally
7 leads to rivalry and disputes over the in-between areas."¹³ Without a settlement, it is likely that
8 there will be numerous future conflicts between Arizona Water and the Global Utilities.¹⁴ The
9 Settlement Agreement is designed to avoid such disputes. Ms. Jaress agreed that avoiding future
10 disputes is a benefit of the Settlement Agreement.¹⁵

11 **D. Promoting regional planning.**

12 Arizona Water and the Global Utilities agree on the benefits on regional planning.¹⁶ They
13 designed the Settlement Agreement to promote regional planning, allowing each party to
14 concentrate their resources and to plan the size and location of their facilities to maximize
15 efficiencies.¹⁷ Regional planning is also very important to achieving water conservation.¹⁸ For
16 example, recycled water facilities require a certain level of economies of scale to make economic
17 sense.¹⁹ Ms. Jaress testified that Staff recognizes promotion of long-term planning as a benefit of
18 the Settlement Agreement.²⁰

22 ¹² Ex. G-2 (Symmonds Rebuttal) at 1:21-23.

23 ¹³ Ex. G-1 (Symmonds Direct) at 6:8.

24 ¹⁴ Ex. G-2 (Symmonds Rebuttal) at 4:5-8.

25 ¹⁵ Tr. at 44:1-6.

26 ¹⁶ See Ex. G-3 (Settlement Agreement) at 2, Recital D.

27 ¹⁷ Ex. G-1 (Symmonds Direct) at 6:21-26.

¹⁸ Ex. G-1 (Symmonds Direct) at 7:1-10.

¹⁹ Ex. G-1 (Symmonds Direct) at 7:1-10.

²⁰ Tr. at 44:1-6.

1 **III. The planning areas are reasonable and beneficial.**

2 The Settlement Agreement provides for planning areas for Arizona Water and the Global
3 Utilities.²¹ Arizona Water and the Global Utilities agree to stay out of each other's planning
4 areas.²² By laying out a clear dividing line, the planning areas will prevent future disputes between
5 Arizona Water and the Global Utilities. And Ms. Jaress conceded that if the planning areas are
6 not approved, "continued disagreement" could plague the region.²³ The planning areas – as the
7 name implies – will allow Arizona Water and Global Utilities to focus their regional, long-term
8 planning efforts, rather than wasting efforts on areas that may be served by the other party. The
9 planning areas were developed using a modified version of "option three" presented in a previous
10 Staff Report in these dockets.²⁴

11 Staff expressed concern over potential impacts on third parties. But the planning areas
12 only apply between Arizona Water and the Global Utilities – third parties are not affected.²⁵ Ms.
13 Jaress testified that Staff was aware that the parties have "repeatedly represent[ed] that the
14 planning areas would and should have no impact on third parties."²⁶ If the Commission approves
15 the planning areas, other utilities could still apply for certificates within the planning area.²⁷ Ms.
16 Jaress acknowledged that the other utility in the area (Santa Rosa, owned by Robson
17 Communities) "has not been shy about asserting its interest[s]" in certificate cases when it has
18 concerns.²⁸

19 Staff also expressed concerns that the planning areas represent an implicit reservation of
20 service areas, that in the future Arizona Water or Global Utilities would not longer be "fit and
21

22 ²¹ See Ex. G-3 (Settlement Agreement) at 3 and Exhibit B; See also Ex. G-4 (overview map)
showing planning area boundary.

23 ²² Ex. G-3 (Settlement Agreement) at 6-7 (Section 6).

24 ²³ Tr. at 73:1-3.

25 ²⁴ Ex. G-1 (Symmonds Direct) at 7-8 (discussing Staff Report dated October 25, 2006 and
Supplemental Staff Report dated December 26, 2006).

26 ²⁵ Ex. G-2 (Symmonds Rebuttal) at 3:23-24.

27 ²⁶ Tr. at 44:12-14.

28 ²⁷ Ex. G-2 (Symmonds Rebuttal) at 3:19-24.

²⁸ Tr. at 45:5-7.

proper” or that a future utility with lower costs could appear. All of these concerns could be addressed in future certificate cases.²⁹ The planning areas do not create a right to a certificate in the future; they are not “Orders Preliminary”.³⁰ In addition, Staff acknowledged that the Commission could explicitly state in its order that “there is no impact to third parties and no implicit reservation.”³¹ The Global Utilities suggest that the Commission include such a statement.

Staff also expressed concern that approval of the planning areas would represent a pre-approval of the prudence of facilities built to serve the planning area. But facilities would not be built until a certificate is issued.³² Moreover, a prudence finding would only be made in a rate case.³³ And the Commission’s rules require prudence be determined at the time the “investments were made” not at the time a planning area was approved.³⁴ Thus, approval of planning areas will not constitute pre-approval of any facilities.

Lastly, Staff expressed a concern that the planning areas could create a precedent for future cases, or could create a flood of applications for planning areas. Those concerns are speculative. This case is possibly the largest certificate dispute in Arizona history. The Commission could make clear that the planning areas were only approved in this unique context, and that future applications for planning areas would be viewed with disfavor. Ms. Jaress testified that “there are all kinds of ways so approval could be structured so it just applied to Arizona Water and Global.”³⁵ That’s just what the Commission should do here.

²⁹ Ex. G-2 (Symmonds Rebuttal) at 3:19-24.

³⁰ Ex. G-1 (Symmonds Direct) at 5:20-27.

³¹ Tr. at 44:15-19.

³² A.R.S. § 40-281.

³³ Ex. G-2 (Symmonds Rebuttal) at 2:12-19.

³⁴ Id. at 2:21-24; A.A.C. R14-2-103.A.3.l.

³⁵ Tr. at 73:14-16.

1 **IV. Certificate Extensions.**

2 There is no dispute that Arizona Water and the Global Utilities have the necessary
3 technical, managerial and financial resources to serve the extension areas they are requesting. And
4 Ms. Jaress testified that Arizona Water and the Global Utilities are "fit and proper entities" to
5 receive the certificate extensions.³⁶

6 **A. Global Utilities' Southeast Extension Area.**

7 Staff supports granting the vast majority of this requested extension area to the Global
8 Utilities. However, Staff recommends denial of two types of areas: (1) areas without a second
9 request for service; and (2) some wastewater-only areas where Arizona Water did not have a
10 corresponding request for water service. Staff's concerns have no basis in Commission decisions,
11 and Staff's concerns should be rejected. In addition, Staff's witness Mr. Gray acknowledged that
12 "there are other reasonable outcomes that would grant greater areas depending upon how you
13 weighed different issues."³⁷

14 The Global Utilities have complied with all request-for-service requirements. They
15 submitted requests for service for 100% of their extension area with their applications.³⁸ Mr. Gray
16 does not dispute that.³⁹ In addition, the Global Utilities obtained second (renewed) requests for
17 service from the vast majority of landowners.⁴⁰ The second requests covered 75.4% of the
18 Southeast Extension area.⁴¹ Mr. Gray testified that Global submitted a "sizeable number of
19 updated requests for service."⁴² In addition, Mr. Gray conceded that in a prior case, the

20
21 _____
22 ³⁶ Tr. at 45:22-25.

23 ³⁷ Tr. at 382:8-11.

24 ³⁸ Ex. G-1 (Symmonds Direct) at 12:6-10.

25 ³⁹ Tr. at 363:16-21.

26 ⁴⁰ Ex. G-27.

27 ⁴¹ Tr. at 266:13-15 (Symmonds); Tr. at 364:18-24 (no dispute from Mr. Gray). If an additional
request received after the hearing is considered, the percentage rises to 77%. See the Global
Utilities' Motion to Admit Late Filed Exhibit filed June 30, 2009, attaching an updated version of
Ex. G-27.

⁴² Tr. at 364:1-7.

1 Commission approved an entire extension area with only 71% second requests.⁴³ That decision –
2 the only Commission decision to address second requests for service – is simply inconsistent with
3 Staff's position.⁴⁴

4 Moreover, Mr. Gray was not able to articulate what standard, if any, he was applying.⁴⁵ He
5 could not provide a level of second requests that would be sufficient (even 100%) and he could
6 only explain "[w]e evaluated the information the companies provided."⁴⁶ Staff has not sufficiently
7 explained or supported its recommendation, and that recommendation would not provide a clear
8 standard for future use.

9 Mr. Gray also recommended that some wastewater areas be denied because Arizona Water
10 did not have a water request for service for those areas. The Commission has never imposed such
11 a requirement before. Mr. Gray conceded that he was not aware of any Commission decision
12 supporting such a requirement.⁴⁷

13 In sum, the Global Utilities provided original requests for service for 100% of the
14 requested Southeast Extension area, and second requests for over 75% of the Southeast Extension
15 area. This meets or exceeds every request for service requirement ever used by the Commission.
16 Thus, the Commission should grant the Global Utilities the entire requested Southeast Extension
17 Area, as shown on Exhibit G-4, and not exclude those areas marked on Exhibit S-9.

18 However, if the Commission agrees with Staff's position, then two modifications to the
19 exclusions shown on Exhibit S-9 are necessary. First, Mr. Gray testified that Arizona Water had
20 received a request for water service for the El Dorado properties, and those properties should thus
21 be included in the Global Water – Palo Verde wastewater extension, even under Staff's
22 unprecedented standards.⁴⁸ Second, after the hearing, Global received an additional second
23

24 ⁴³ Tr. at 366:3-10.

25 ⁴⁴ Ex. G-26 (Decision No. 70381, June 13, 2008) at Finding of Fact No. 36.

26 ⁴⁵ Tr. at 366-368.

27 ⁴⁶ Tr. at 368:15-17.

⁴⁷ Tr. at 370:13 to 371:5.

⁴⁸ Tr. at 361:19 to 362:13.

request for service from Dugan Lands, LLP.⁴⁹ On July 29, 2009, Staff filed a memorandum recommending that this parcel be included in the Global Water – Palo Verde certificate extension.

B. North Service Area.

The Global Utilities have also requested a small extension to their North Service Area.⁵⁰ This extension is shown on Exhibit G-9. No party has opposed this request, and it should be granted.

C. Transfer to Arizona Water.

Under the Settlement Agreement, the Global Utilities have agreed to transfer a small parcel from Global Water – Santa Cruz’s water certificate to Arizona Water. This area is shown by a small flag on Exhibit G-4. No party has opposed this transfer, and it should be granted.

D. Francisco Grande & CP transfer.

The Global Utilities have requested that the certificates of Francisco Grand and CP be transferred to Global Water – Santa Cruz and Global Water – Palo Verde. This transfer will consolidate the certificates in this region owned by Global Water, Inc. Staff states that the transfer will be consistent with Commission goals and recommends approval.⁵¹ There have been no objections, and the transfer should be approved.

E. Arizona Water extension.

In accordance with the Settlement Agreement, Global supports Arizona Water’s requested extension area. However, to the extent that the Commission does not grant this entire area to Arizona Water, it should still grant an area greater than suggested by Staff. A sizable area was excluded by Staff because Arizona Water did not provide requests for wastewater service – a service Arizona Water does not provide. As described above, Staff’s proposed requirement for “dual” water and wastewater requests, when only one service is applied for, is unprecedented and finds no support in any prior Commission decisions. Moreover, the evidence showed that all of the

⁴⁹ See the Global Utilities’ Motion to Admit Late Filed Exhibit filed June 30, 2009.

⁵⁰ Tr. at 255-257.

⁵¹ Ex. S-1 (Gray Staff Report) at 7.

1 areas requested by Arizona Water were either within Global Water – Palo Verde’s ADEQ and EPA
2 approved Section 208 wastewater service area, or are within the planning area of the City of Casa
3 Grande.⁵²

4 **V. Proposed Conditions.**

5 The Global Utilities support all of Staff’s proposed conditions, except two. First, Staff’s
6 proposed condition number 5, requiring 208 approval, is not necessary because Global Water –
7 Palo Verde already has Section 208 approval for this region.⁵³ Mr. Gray agreed that this condition
8 should be deleted.⁵⁴

9 Second, the Global Utilities request that deadline to obtain the Designation of Assured
10 Water Supply (“DAWS”) be extended to December 31, 2012 and that the deadline to obtain the
11 Approval to Construct be extended to December 31, 2013.⁵⁵ The Global Utilities are concerned
12 that the state budget situation may delay permit processing timeframes.⁵⁶ In addition, Staff’s
13 proposed deadline for the DAWS (December 31, 2011) is the same as its proposed deadline for
14 Arizona Water to obtain a Physical Availability Determination (“PAD”). But Staff witness Mr.
15 Marlin Scott testified that a DAWS is an additional step beyond a PAD.⁵⁷ Additional time is
16 reasonable to obtain this additional step beyond what AWC is required to provide.

17 **VI. Conclusion.**

18 The Settlement Agreement resolves a long-running and contentious dispute. The
19 Settlement Agreement promotes long-term planning, prevents future disputes, and advances the
20 use of recycled water. It also contains reasonable planning areas that are essential to preventing
21 future disputes, are based on a prior Staff recommendation, and will not impact the rights of any
22 third parties. The Settlement Agreement and planning areas should be approved.

23
24 ⁵² See Ex. G-8 (208 Map); Ex. G-4 (planning area and MOU map).

25 ⁵³ Ex. G-8 (208 Map).

26 ⁵⁴ Tr. at 371:15-18; see also Tr. at 302:18-23 (Testimony of Ms. Hains).

27 ⁵⁵ Ex. G-2 (Symmonds Rebuttal) at 7:16-21.

⁵⁶ Id.

⁵⁷ Tr. at 297:22 to 298:3.

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Staff's concerns are both speculative and paradoxical. Staff's concerns are speculative because they concern possible future outcomes that can be avoided. Staff's concerns are paradoxical because Staff recognizes the benefits of the Settlement Agreement, and they show no desire to return to the previous litigation situation, yet they oppose Commission approval – the very thing needed to get the benefits they acknowledge.

The Commission should also grant the certificate extensions requested by Arizona Water and the Global Utilities. The only basis for denial of the Global extensions put forward by Staff was requests for service – but the Global Utilities have met or exceeded every standard for requests for service previously used by the Commission. And no party opposes the Francisco Grande and CP transfers, which should therefore be approved.

RESPECTFULLY SUBMITTED this 3rd day of August, 2009.

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